

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America

v.
Alkis Nakos

* * * * *
* * * * *
* * * * *
* * * * *
* * * * *
* * * * *
* * * * *
* * * * *
* * * * *
* * * * *

No: 1:14-cr-00093-LM

MOTION FOR PREPARATION OF TRANSCRIPT AT GOVERNMENT'S EXPENSE

NOW COMES Defendant Alkis Nakos, by and through his counsel, Robert S. Carey, Orr & Reno, P.A., and moves this Honorable Court to order the production of a transcript, at the Government's expense, of his detention hearing for the following reasons:

1. On June 30, 2014, a detention hearing was held. Sgt. Jennifer McKenzie testified at the hearing and is expected to testify at the trial. As a result, the transcript is important for undersigned counsel's trial preparation and examination of Sgt. McKenzie and other witnesses at trial.

2. Mr. Nakos is indigent. He is incarcerated at the Essex County House of Corrections in Massachusetts. Undersigned counsel was appointed to represent Mr. Nakos on June 24, 2014.

3. Assistant United States Attorney, Terry L. Ollila, does not object to this motion.

4. Given the nature of this request, no memorandum of law is necessary.

WHEREFORE, the Defendant, Alkis Nakos, respectfully requests this Court to:

- A. Grant this Motion and order the production of the transcript at the Government's expense; and
- B. Provide for any other relief as is equitable and just.

Respectfully submitted,

ALKIS NAKOS

By his Attorneys,

Dated: October 21, 2014

/s/ Robert S. Carey
Robert S. Carey, NH Bar #11815
ORR & RENO, P.A.
45 S. Main Street, Suite 400
P.O. Box 3550
Concord, NH 03224-3550
(603) 224-2381

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2014, a copy of the within Motion was Electronically Served upon all counsel of record and Conventionally upon Alkis Nakos.

/s/ Robert S. Carey
Robert S. Carey, NH Bar #11815

1215052_1